



ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)
Compliance Evaluation Inspection (CEI) Report

1) Author of Report

Bailee Dykes
Environmental Scientist
Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

Sanmina Corporation (Sanmina)
13000 South Memorial Parkway
Huntsville, (Madison County), Alabama 35803

EPA ID Number: ALD983166257
NAICS Code(s): 334418,334419

3) Responsible Official(s)

Ms. Patsy Smolik – Corporate Environmental Health and Safety Engineer
Telephone: 256-882-4144
Email: [HYPERLINK "mailto:patsy.smolik@sanmina.com"]

4) Inspection Participant(s)

Ms. Patsy Smolik – Sanmina
Mr. Malcom Readus – Sanmina
Mr. Keith Bush – Sanmina
Mr. Rodney Tielking – Sanmina
Ms. Paula Whiting – U.S. Environmental Protection Agency
Ms. Bailee Dykes – ADEM

5) Date of Inspection

March 14, 2017

6) Applicable Regulations

[PAGE * MERGEFORMAT] | Page 1 of 1



ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

7) Purpose of Inspection

The purpose of this inspection was to determine compliance with all applicable requirements of the Hazardous Waste Program regulations.

8) Facility History & Description

Sanmina is a manufacturer of communication and infrastructure, defense, and aerospace equipment. Industrial and semiconductor systems, medical, enterprise computing and storage solutions data are all aspects of the inter-workings of Sanmina. Sanmina also conducts business in multimedia, automotive and technology sectors. The Huntsville location assembles circuit boards and electronic components for blood glucose monitors, blood pressure monitors, missiles, helicopters, etc. The Huntsville location has been in operation since 1984 as Sanmina, previously as GTE in 1966. The facility employs 1441 people; 39 of whom have assigned jobs related to hazardous waste management. The facility consists of two plants: Plant 437 (Defense/Aerospace (Governmental Side)) and Plant 438 (Medical Division). The hours of operation during the week consist of three overlapping shifts from 4:00 a.m. to 1:00 a.m. and occasional 12 hour weekend shifts. The combined plants consist of approximately 685,000 square feet (13 acres underroof), and situated on a total of 48 acres. The facility last submitted a *Notification of Regulated Waste Activity* form (ADEM Form 8700-12, received by the Department on April 12, 2016) identifying itself as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

9) Observations

At approximately 9:30 a.m. a representative of the U.S. Environmental Protection Agency (Ms. Whiting), and I hereinafter "we" or "us" arrived at the facility and were issued visitor badges for entrance to the plant. We were then greeted by Ms. Smolik. At that time, we identified ourselves and explained the purpose of the inspection. Following the opening conference, Mr. Butler guided us on a walk-through inspection of the facility, noting the following areas:

Plant 438 (Medical Side)

First, Ms. Smolik escorted us to Plant 438, which consists of the medical side of Sanmina. In this plant, there are several production lines for making circuit boards. According to Ms. Smolik, excess flux generated in this area is recycled. The main hazardous waste generated here is aerosol cans (e.g. dust spray cleaner) used to clean the machines. The product in the aerosol cans are used completely, then the empty aerosol cans are punctured and placed on a shelf in the plant prior to being disposed. No areas of concern were noted in Plant 438 at the time of the inspection.



90-day Hazardous Waste Storage Area

Next, Ms. Smolik escorted us to the 90-day hazardous waste storage area. The entrance to the hazardous waste storage area was locked/secured and had signage bearing the words "Entrance Into Hazardous Waste Storage Area Must be kept clear at all times" and "Danger – Unauthorized Personnel Keep Out". In this area, we observed three wooden pallets holding 5-gallon metal containers of lead solder paste to be recycled, eight 55- gallon drums of hazardous, one 30-gallon container of flux waste, and one 30-gallon container of non-hazardous soapy water (see Photographs #1 - #3). The eight 55-gallon drums were labeled with the words "Hazardous Waste" "Waste Solvent/Paint Related"; marked with "2/21/17", "3/6/17", "3/8/17", "2/14/17", "1/24/17", "1/10/17", "2/7/17", and "1/31/17" for accumulation start dates; closed; and all contained "D001, D035, F003, F005" hazardous waste. One 30-gallon drum was labeled with the words "Hazardous Waste", "Corrosive"; marked with "1/12/17" for an accumulation start date; closed; and contained a "D002" hazardous waste. The other 30-gallon drum was labeled with the words "Non-Regulated Waste" and contained a soap/water mixture. The 90-day hazardous waste storage area was equipped with a proper secondary containment system. No areas of concern were noted in this area at the time of the inspection.

Maintenance Room

Next, Ms. Smolik escorted us to maintenance room. In this area, we observed a spent aerosol can that was disposed of in the trash not punctured (see Photograph #4). Staged along the wall, we observed five yellow fireproof metal cabinets. Each cabinet several gallon containers of water based and oil based paint and aerosol cans. Four aerosol cans staged in a metal cabinet were missing spray nozzles (see Photograph #5). Staged on a table in the maintenance room, we also observed a 5-gallon metal flammable flip top container. Inside the container was a solvent and paint brush. The container was not labeled to identify the contents inside (see Photograph #6 and #7).

Outside Tank Area

Next, Ms. Smolik escorted to an area that use to house a tank which is adjacent to the maintenance room. In this area, we observed five 5-gallon containers of paint waste and two plastic coffee containers that appear to be cleaned in this area and poured into sump pump. Inside the old tank area, we observed the concrete area covered in the white paint residue (see Photographs #8 through #10). The sump near the outside tank was also observed with residual paint and had a solvent smell (see Photograph #11 and #12). According to Ms. Smolik, the contents inside the sump are sent to city sewage.

Supply Room

Next, Ms. Smolik escorted us to the supply room where we were greeted by Mr. Malcom Readus, Purchasing Assistant. Universal wastes are transported by Veolia ES Technical Solutions, LLC (FL0000207449) to Veolia ES Technical Solutions, LLC (FL0000207449). In this area, we observed six 2ft cardboard boxes and eleven 4ft cardboard boxes of used



fluorescent lamps that were not marked with accumulation start dates. All of the cardboard boxes were labeled with the words “Universal Waste”, however, one of the 4ft boxes was observed open at the time of the inspection (see Photographs #13 through #15). In this area, we also observed one plastic container holding used bulbs and ballasts (see Photograph #16). The container was open and not marked with an accumulation start date.

Plant 437 (Defense/Aerospace (Governmental Side))

Next, Ms. Smolik escorted us to Plant 437, which consists of the governmental contract side of Sanmina. Ms. Smolik escorted us to the coating operations area where the hazardous waste is generated in the plant. Two coating operations: parylene coating and conformal coating are applied to circuit boards in this area. Hazardous waste that is generated in this area is transferred into 5-gallon containers that are kept in a yellow fireproof metal cabinet. According to Mr. Keith Bush, Chemical Control Technician at Sanmina, the laboratory for space to work is restricted. Due to space restrictions, the 5-gallon containers are taken and emptied daily to the satellite accumulation point storage area for the laboratory. Mr. Bush also stated that some days the coating operations lab may not perform any painting and that it is all demand driven.

Satellite Accumulation Point Storage

Next, Ms. Smolik, Mr. Teilking, and Mr. Bush escorted us to a metal building that is located at the rear of the facility utilized for satellite accumulation. The entrance to the building was locked and had signage bearing the words “Caution – Hazardous Waste Satellite Accumulation Point – Unauthorized Personnel Keep Out” and “No Smoking”. In this area, we observed one 55-gallon drum designated for puncturing aerosol cans, four 55-gallon drums and one 5-gallon container of hazardous waste (see Photographs #17 through #19). The aerosol can puncturing drum was closed, labeled with the words “Hazardous Waste” and “Waste Solvent/Paint Related”, marked with “9/05/08”, and contained “D001, D035, F003, and F005” hazardous waste. One 55-gallon drum was labeled with the words “Hazardous Waste”, “Flammable Solids”, closed, and marked with “10/6/16” for an accumulation start date. One 55-gallon drum was labeled with the words “Hazardous Waste” and “Waste Solvent/Paint Related Flammable Liquids” closed, and marked with “3/08/17” for an accumulation start date. One 55-gallon drum was labeled with the words “Hazardous Waste – Araldite/Aradur Mixture”, closed, marked with “10/24/16” for an accumulation start date, and contained a “D002” hazardous waste. One 55-gallon drum was labeled with the words “Hazardous Waste – Corrosive Waste”, closed, marked with “7/27/16” for an accumulation start date, and contained “D001 and D002” hazardous waste. One 5-gallon container was labeled with the words “Hazardous Waste – RTV 608”, closed, and marked with “12/16/15” for an accumulation start date. In this area, we also observed one 30-gallon container of spent lead-acid batteries. The container was closed, marked with “8/10/16” for a start accumulation date, and labeled with the words “Universal Waste”.

Commented [WB1]: Is this correct?

In the satellite accumulation point storage, we also observed a couple of yellow fireproof metal cabinets. In one cabinet, we observed various chemicals that were expired and no longer useable (see Photograph #20). According to Mr. Bush, he inherited the cabinet of expired chemicals



approximately a month ago. The chemicals have not yet been lab packed and are scheduled to be shipped off-site soon.

Mr. Bush stated that as part of their management procedures, an accumulation start date is marked on each drum as well as kept in a log book in the coating operations laboratory. When a drum is full, a finish date is marked on the drum as well, record in the log book, then a new hazardous waste label is placed on the drum with the accumulation start date of when the drum is full and transferred to the 90-day storage area. Weekly inspections are also conducted for the satellite accumulation point storage area.

Broiler Room 250

Last, Ms. Smolik and Mr. Teilking escorted us to the Broiler Room. In this area, we observed one 250-gallon used oil tote. The tote was closed and labeled with the words "Used Oil" (see Photograph #21).

Records Review

After the walk-through inspection of the facility, we asked to review the following documents required by Division 14 of the ADEM Administrative Code:

- Hazardous waste shipping manifests for the last three years
- Weekly inspection logs of hazardous waste storage areas
- Training records of employees who manage hazardous waste
- Contingency Plan
- Documentation of arrangements with local emergency responders
- Waste Minimization Plan

After a review of documents, the following items were noted:

- Hazardous wastes are sent to Tradebe Treatment and Recycling are sent to Millington, Tennessee (TND000772186) and Cookson Electronics (Alpha) in Altoona, Pennsylvania (PAD089352983) for storage treatment;
- Non-hazardous wastes are sent to Veolia ES Technical Solution, LLC (WID988566543) in Port Washington, Wisconsin;
- Solder dross is sent to Conesus LLC (TXR000000034) in Terrell Texas;
- One employee who manages hazardous waste and universal waste does not have the required hazardous waste management training;
- The Emergency Coordinator list needs to be updated in the facility's Contingency Plan;
- The Waste Minimization Plan was not available for review at the time of the inspection;
- One hazardous waste manifest dated "1/5/17" was missing the designated facility to generator form; and
- Contingency Plan was missing the documentation letters for arrangements with local emergency responders



Summary

This inspection was performed to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code. During the inspection, the following areas of concern or potential noncompliance were noted:

- One spent aerosol can disposed of in the trash not punctured;
- Four aerosol spray cans missing spray nozzles;
- Four 5-gallon containers were observed near the outside tank area having white paint residue and being poured into the sump pump, which is sent to the adjacent sump. The sump had white residual paint and a solvent smell. The contents in the sump are then sent to city sewage;
- Six 2ft boxes and eleven 4ft boxes of used florescent lamps were not marked with accumulation start dates;
- One 4ft box of used fluorescent lamps were open;
- One plastic container holding used bulbs and ballasts were open and not marked with an accumulation start date;
- One flammable cabinet of expired chemicals not labeled or dated;
- One employee who manages hazardous waste and universal waste does not have the required hazardous waste management training;
- The Emergency Coordinator list needs to be updated in the facility's Contingency Plan;
- The Waste Minimization Plan was not available for review at the time of the inspection;
- One hazardous waste manifest dated "1/5/17" was missing the designated facility to generator form; and
- Contingency Plan was missing the documentation letters for arrangements with local emergency responders

Following the walk-through inspection, we discussed our observations with Ms. Smolik. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report*, indicating observations noted during the time of inspection. Ms. Smolik reviewed, signed, and accepted the report on behalf of Sanmina. We concluded the closing conference and departed the site at approximately 5:00 p.m.

10) Signed

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

04/11/2017



Date

11) Concurrence

Brent A. Watson, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

04/11/2017
Date

PHOTO LOG



Photograph #1: 90-day Area: Lead Solder waste to be recycled



Photograph #2: 90-day Area: Eight drums of hazardous waste



Photograph #3: 90-day Area: One-30 gallon drum of flux waste (left) and one 30-gallon drum of non-hazardous soapy water (right)



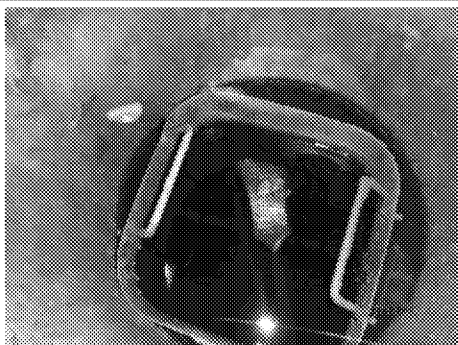
Photograph #4: Maintenance Room: Aerosol can and paint can discarded in the garbage



Photograph #5: Maintenance Room: Aerosol cans missing spray nozzles



Photograph #6: Maintenance Room: Flammable flip top container



Photograph #7: Maintenance Room: Solvent and paint brush in the flammable flip top container



Photograph #8: Outside Tank Area: containers with paint waste



Photograph #9: Outside Tank Area: containers of paint waste



Photograph #10: Outside Tank Area: Paint Residue



Photograph #11: Sump near Outside Tank: with paint residual and solvent smell





Photograph #12: Sump near Outside Tank: with paint residual and solvent smell







Photograph #13: Supply Room: Universal Waste



Photograph #14: Supply Room: Universal Waste

storage	storage
 <p>Photograph #15: Supply Room: Universal Waste storage</p>	 <p>Photograph #16: Supply Room: Universal Waste storage container</p>

 <p>Photograph #17: Satellite Accumulation Point Storage</p>	 <p>Photograph #18: Satellite Accumulation Point Storage</p>
 <p>Photograph #19: Satellite Accumulation Point Storage</p>	 <p>Photograph #20: Satellite Accumulation Point: flammable cabinet of expired chemicals</p>

ADAM



Photograph #21: Broiler Room: Used Oil Tote